

LOU ELLEN ADAMS  
CIRCUIT CLERK, FORREST COUNTY  
P.O. BOX 992  
HATTIESBURG, MS. 39403

I, LOU ELLEN ADAMS, CLERK OF THE CIRCUIT COURT  
OF FORREST COUNTY MISSISSIPPI, HEREBY CERTIFY  
THAT THE FOLLOWING PAPERS ARE ALL PAPERS FILED  
IN THE STYLED CAUSE # CI12-0147 FIELD WITH THIS THE  
CIRCUIT COURT OF HATTIESBURG, FORREST  
MISSISSIPPI TO WIT;

DERRICK STEVERSON

VS

FORREST COUNTY MISSISSIPPI,  
FORREST COUNTY SHERIFF'S DEPARTMENT,  
FORREST COUNTY SHERIFF BILLY MAGEE,  
MS DEPT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ,  
TROOPER JAMIE ATKINS & TROOPER CLAY LOFTIN,  
INDIVIDUALLY, & IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MS HIGHWAY PATROL,  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY &  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SEE ATTACHED DOCUMENTS  
CAUSE #CI12-0147

GIVEN UNDER MY HAND AND SEAL OF OFFICE THIS  
the 24<sup>TH</sup> DAY OF SEPTEMBER 2012

LOU ELLEN ADAMS, CIRCUIT CLERK  
FORREST COUNTY MISSISSIPPI

BY:  D.C.

MCMAPT01

CASE FILE MAINTENANCE - PARTIES

MCWAPT01/R2

BUSINESS / COMMERCIAL

Judge Robert B. Helfrich

Case Number CI12-0147

File No. 20208 Type 1

Styled

STEVERSON DERRICK

VS

FORREST CO. MS FORREST CO SHERIFF'S DEPT

42 USC SECTION 1983

Search by Last Name

Party Name	Party Type	Phone Number
1) Steverson Derrick	PLAINTIFF ACTIVE PRIMARY	
2) Forrest Co. Ms Forrest Co She	DEFENDANT ACTIVE PRIMARY	
3) Forrest Co Sheriff'S Dept	DEFENDANT ACTIVE PRIMARY	
4) Forrest Co Sheriff Billy Mage	DEFENDANT ACTIVE PRIMARY	
5) Ms Dept Of Public Saftey	DEFENDANT ACTIVE PRIMARY	
6) Commissioner Albert Santa Cru	DEFENDANT ACTIVE PRIMARY	
7) Trooper Jamies Atkins	DEFENDANT ACTIVE PRIMARY	
8) Trooper Clay Loftin	DEFENDANT ACTIVE PRIMARY	
9) Deputy Matt Findley	DEFENDANT ACTIVE PRIMARY	
10) Captian Glen Moore	DEFENDANT ACTIVE PRIMARY	
11) Deputy Randal Smith	DEFENDANT ACTIVE PRIMARY	
12) Barrett,William C	P ATTYS ACTIVE PRIMARY	601-973-2270
13)		
14)		
15)		

F1-15 TO EDIT, F20 TO ADD F24-IF FINISHED  
 \*BOTTOM\*

CERTIFIED A TRUE COPY  
 Forrest County, Minn.  
 Law Enforcement, Sheriff's Dept

This is a true copy of the original  
 24 Sep 2012  
 [Signature]

1 General Docket, Civil Cases, Circuit Court, FORREST COUNTY CIRCUIT COU

No. CI12-0147

CFN 20208

STEVEVERSON DERRICK  
Vs.Counsel for Plaintiff  
Barrett, William C  
Counsel for DefendantFORREST CO. MS FORREST CO SHERIFF'S DEPT  
42 USC SECTION 1983

JUDGE Robert B. Helfrich

DATE ORDERS, JUDGMENTS, ETC. BK/PG

7/13/2012 complaint  
 7/13/2012 summons issued 7-13-2012 SMITH, MOORE, FINDLEY, LOFTIN, ATKINS,  
 CRUZ, MCGEE, FCSO, FORREST CO BOARD OF SUPERVISORS \*RTA 7-13-12  
 9/05/2012 SUMMONS RETURNED SERVED 8-31-2012 SMITH, MOORE, FINDLEY, LOFTIN  
 ATKINS, CRUZ, FC BOARD OF SUPERVISORS, FC SHERIFF'S DEPT, MAGEE  
 PERSONAL SERVICE  
 9/24/2012 MAILED TRUE CERTIFIED COPIES TO MS. ATTORNEY GENERAL OFFICE  
 ATTENTION SHARON SMITH P O BOX 220 JACKSON MS 39205 ON 9-24  
 2012

CERTIFIED A TRUE COPY  
 Forrest County, MS  
 Law Clerk: Ashlee, Clerk of Court

Filed 29 Sep 2012  
 [Signature]

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI  
FILED

DERRICK STEVERSON

JUL 13 2012

PLAINTIFF

VS

*Lou Ellen Adams*  
FORREST COUNTY CIRCUIT CLERK

CAUSE # CI12-0147

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

DEFENDANTS

COMPLAINT

COMES Plaintiff, Derrick Steverson, by and through counsel, and files this Complaint against the Defendants, Forrest County Mississippi; Forrest County Sheriff's Department; Forrest County Sheriff Billy McGee; Mississippi Department of Public Safety, Commissioner Albert Santa Cruz; Trooper Jamie Atkins and Trooper Clay Loftin, individually, and in their professional capacity as officers of the Mississippi Highway Patrol; Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith, individually, and in their professional capacity as officers of the Forrest County Sheriff's Department (hereinafter "Defendants"), and states as follows:

**JURISDICTION AND INTRODUCTION**

1. This is an action at law to redress the deprivation under color of statute, ordinance, regulation, custom, or usage of a right, privilege, and immunity secured to Plaintiff by the

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk  
This the 24 day of SEP, 2012  
By: *[Signature]* D.C.

Fourth, Eighth, and Fourteenth Amendment to the Constitution of the United States, 42 USC §§ 1983 and arising under the law and statutes of the State of Mississippi.

2. This Court has jurisdiction because the alleged tortuous acts and omissions of the Defendants were committed in whole or in part in the State of Mississippi.

3. Venue is proper in Forrest County, Mississippi, pursuant to the Mississippi Tort Claims Act, Section 11-46-13, Mississippi Code of 1972, as amended.

4. The matter in controversy exceeds, exclusive of interest and costs, the sum or value of Fifty Thousand Dollars (\$50,000.00).

5. Plaintiff Derrick Steverson, during all times mentioned in this complaint was a citizen of the United States, and resided in the City of Hattiesburg, State of Mississippi.

6. At all times relevant herein, Defendants Forrest County Mississippi, Forrest County Sheriff's Department, and Forrest County Sheriff Billy McGee were public entities, organized, or elected under the laws of the State of Mississippi.

7. At all times relevant herein, Defendants Mississippi Department of Public Safety was a public entity, organized under the laws of the State of Mississippi.

8. At all times relevant herein, Trooper Jamie Atkins and Trooper Clay Loftin were officers employed by the Defendant Mississippi Department of Public Safety, and are being sued individually and in their official capacities.

9. At all times relevant herein, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith were employed by the Defendant Forrest County Sheriff's Department and are being sued individually and in their official capacities.

10. At all times material to this Complaint, Defendants Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith acted under the

color of their official capacity and their acts were performed under color of the statutes, customs, ordinances and usage of the State of Mississippi, Mississippi Department of Public Safety, and Forrest County Sheriff's Department.

11. The Individual Defendants Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith were the servants, agents, and employees of their Co-Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department so that their acts are imputed to the Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department.

12. During all times mentioned here, Defendants Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith were acting pursuant to orders and directives from Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department.

13. Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department provided Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith with official badges and identification cards which designated and described the bearer as law enforcement officers of the Mississippi Highway Patrol or Forrest County Sheriff's Department. Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department are the entities in whose names the individual Defendants Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith performed all acts and omissions described and alleged herein.

14. During all times mentioned here, the individual Defendants provided Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall

Smith acted under color of law, to wit, under color of the statutes, ordinances, regulations, customs and usages of the State of Mississippi and the County of Forrest and the Defendants, Mississippi Department of Public Safety and Forrest County Sheriff's Department. Defendant Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith engaged in the illegal conduct herein mentioned, deprived Plaintiff of the rights, privileges, and immunities secured to by the Fourth, Eighth and Fourteenth Amendment to the Constitution of the United States and the laws of the United States.

15. As a direct and proximate result of the acts and omissions of Defendants, as further described herein, the Plaintiff sustained and suffered physical injury, medical expenses, severe mental anguish, and emotional trauma in connection with the deprivation of his constitutional and statutory rights guaranteed by the Constitution of the United States.

#### **PATTERN OF ILLEGAL CONDUCT**

16. The Defendant Forrest County Sheriff's Department and its deputies together with persons unknown to the Plaintiff, acting acting under color of law, have subjected Plaintiff and other citizens to a pattern of conduct consisting of harassment, assault, and excessive force in making an arrest, assault and battery, and unlawful arrest, in denial of rights, privileges, and immunities guaranteed Plaintiff and other citizens by the Constitution of the United States. This systematic pattern of conduct consists of individual acts of excessive force, assault and battery, and humiliation perpetrated on Plaintiff and other citizens by the individual Deputies of the Forrest County Sheriff's Department and other agents, employees and members of the Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department unknown to Plaintiff, acting separately and in concert, under the color of law. These acts of excessive force, assault and battery, and humiliation, while carried out under color of law, have

no justification or excuse in law, and are instead gratuitous, illegal, improper, and unrelated to any activity in which law enforcement officers may appropriately and legally engage in the course of protecting persons or property, or ensuring civil order. Despite the fact that they knew or should have known of the fact that this pattern of conduct was being carried out by their agents and employees, Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department have taken no steps or efforts to order a halt to this course of conduct, to make redress to the Plaintiff or other citizens injured thereby, or to take any disciplinary action whatever against any of their employees or agents.

17. These acts and omissions as described herein were willful and wanton and were committed in deliberate indifference to and in conscious disregard to Plaintiff's health and safety in violation of his constitutional rights under the United States Constitution.

18. As a direct and proximate result of the foregoing acts and omissions of Defendants, the Plaintiff sustained and suffered physical injury, medical expenses, severe mental anguish, and emotional trauma with the deprivation of her constitutional and statutory rights guaranteed by the Constitution of the United States.

#### **FACTUAL BACKGROUND – MARCH 27, 2011 INCIDENT**

19. On or about March 27, 2011, the Plaintiff was driving his vehicle from Hattiesburg, MS to the Mississippi Gulf Coast on Highway 49 southbound. While driving just south of Hattiesburg, the vehicle burst into flames causing the Plaintiff to drive the vehicle off the road. Plaintiff exited the vehicle for his safety and began walking southbound on Highway 49 in order to get help.

20. Plaintiff was picked up by a motorist on the side of the highway and transported to a gas station a few miles south of the location where his car was wrecked. Shortly after arriving at the



gas station, a Forrest County Sheriff's Deputy arrived on the scene and soon thereafter placed the Plaintiff in handcuffs in the back of the Deputy's vehicle. Paramedics arrived on the scene and quickly checked on Plaintiff's condition. Paramedics confirmed that Plaintiff had no injury from the vehicle fire.

21. Soon thereafter, a Trooper from the Mississippi Highway Patrol arrived at the gas station and issued tickets for DUI and careless driving to Plaintiff. Plaintiff was then transported to the Forrest County Jail in the Trooper's vehicle.

22. Once at the Forrest County Jail, Plaintiff was dragged into a room to be administered the Breathalyzer test. In that room, a Deputy from the Forrest County Sheriff's Department and the Trooper assaulted the Plaintiff. Plaintiff was hit in the face multiple times and ultimately ended up nearly unconscious on the floor. Prior to the assault, plaintiff had asked to be administered the Breathalyzer test before the assault. After the assault, law enforcement officers in the jail charged Plaintiff with refusal to submit to the Breathalyzer test because Plaintiff was nearly unconscious and could not physically take the test.

23. Next, Plaintiff was dragged out of the room for the breath test, across the floor by several officers, and into a holding cell. While locked in the holding cell a Deputy of the Forrest County Sheriff's Department sprayed the Plaintiff in his face with jail supplied pepper spray or mace. At no time was Plaintiff acting in a manner which would justify the use of pepper spray or mace on a person behind bars in a holding cell.

24. Plaintiff ultimately bonded out jail the next day and received treatment at Forrest General Hospital in Hattiesburg, MS. Later, Plaintiff was charged with disorderly conduct in an effort to cover up the actions of the officers in the Forrest County Jail.

25. The events that occurred on March 27, 2011 were recorded on the camera system which

is maintained by the Forrest County Jail. Upon information and belief, video of the incident has been destroyed and/or not supplied to Plaintiff's counsel for use in the related DUI prosecution.

26. Plaintiff received facial and arm trauma, a swollen black eye, and trauma to his eyes because of the pepper spraying. Plaintiff had significant pain afterwards and facial injury which affected his employment situation. As a result of the actions of the Defendants, the Plaintiff has suffered physical injury, medical expenses, severe mental anguish, and emotional trauma.

27. The Defendants committed assault and battery and bodily injury on Plaintiff and failed to follow proper police procedures for addressing the situation with Plaintiff.

28. Notwithstanding his knowledge and awareness, Defendants, were deliberately indifferent to Plaintiff's health and safety and knew of and intentionally disregarded the excessive risk to Plaintiff's health and safety by their acts and omissions described herein.

29. The acts and omissions of Defendants as described herein were willful and wanton and were committed by these Defendants by deliberate choice in deliberate indifference to and in conscious disregard to the risk of Plaintiff health and safety in violation of his constitutional rights under the United States Constitution. Defendants' actions were not a good-faith effort to maintain or restore discipline, but rather they were used maliciously and sadistically to hurt the Plaintiff.

30. As a direct and proximate result of the foregoing acts and omissions of Defendants as described herein, the Plaintiff sustained and suffered physical injury, medical expenses, severe mental anguish, and emotional trauma with the deprivation of his constitutional and statutory rights guaranteed by the Constitution of the United States.

### **SUPERVISION, TRAINING, CORRECTION**

31. The failure of Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department and/or other persons unknown to Plaintiff to adequately instruct, train, supervise, control, discipline and correct its police officers, as described herein, was a deliberate choice in deliberate indifference to, and in conscious disregard of, the risk to the health and safety and constitutional rights under the U. S. Constitution of persons such as Plaintiff in the situations described herein. Further, this failure amounted to an official policy and custom of Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department.

32. Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department directly or indirectly, under color of law, approved or ratified the unlawful, deliberate, malicious, reckless, and wanton conduct of Defendants Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith heretofore described.

33. As a direct and proximate cause of the acts and omissions of the Defendants as described herein, Plaintiff suffered physical injury, medical expenses, and severe mental anguish in connection with the deprivation of his constitutional and statutory rights guaranteed by the Constitution of the United States.

### **COUNT I - FEDERAL CLAIMS**

34. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1-34 of this Complaint as if fully rewritten herein.

35. This Count I is brought against all Defendants for the deprivation by Defendants under color of Mississippi law, statute, ordinance, regulation, custom and usage of a right, privilege,

and immunity secured to Plaintiff by the Fourth, Eighth and Fourteenth Amendments to the Constitution of the United States.

36. Defendants' violations of Plaintiff constitutional rights as described herein violate 42 U.S.C. Sections 1983.

37. Defendants' acts and omissions, and each of them, separately and in concert, as described herein, violated Plaintiff rights under the Fourth, Eighth and Fourteenth Amendment of the United States Constitution and directly and proximately caused Plaintiff to sustain physical injury, medical expenses, severe mental anguish, and emotional trauma.

**WHEREFORE**, Plaintiff Derrick Steverson demands judgment against Defendants, jointly and severally, for compensatory damages in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus attorney's fees and the costs of this action, together with such other and further relief as the Court deems just and equitable.

#### **COUNT II - STATE CLAIMS - ASSAULT AND BATTERY**

38. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1-37 of this Complaint as if fully rewritten herein.

39. This Count II is brought by Plaintiff against all Defendants for the assault and battery committed by the individual Defendants Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith as described herein on March 27, 2011 on Plaintiff.

40. As a direct and proximate result of the acts and omissions of Defendants, as described herein, Plaintiff sustained and suffered physical injury, medical expenses, severe mental anguish, and emotional trauma.

**WHEREFORE**, Plaintiff Derrick Steverson demands judgment against Defendants, jointly and severally, for compensatory damages in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus attorney's fees and the costs of this action, together with such other and further relief as the Court deems just and equitable.

**COUNT III - STATE CLAIMS - UNLAWFUL USE OF EXCESSIVE FORCE**

41. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1-40 of this Complaint as if fully rewritten herein.

42. This Count III is brought by Plaintiff against all Defendants for unlawful use of excessive force committed by individual Defendants Trooper Jamie Atkins, Trooper Clay Loftin, Deputy Matt Findley, Captain Glen Moore, and Deputy Randall Smith on March 27, 2011.

43. Plaintiff did not commit a crime or any act which justified the Defendants' acts and omissions as described herein, but even if he had, the Defendants were not justified in using excessive force. The use of excessive force on Plaintiff was unreasonable and totally without justification.

44. As a direct and proximate result of the foregoing illegal and willful and wanton acts and omissions of Defendants, Plaintiff suffered physical injury, emotional trauma, medical expenses, and severe mental anguish.

**WHEREFORE**, Plaintiff Derrick Steverson demands judgment against the Defendants, jointly and severally, for compensatory damages in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus attorney's fees and the costs of this action, together with such other and further relief as the Court deems just and equitable.

**COUNT IV - STATE CLAIMS -  
FAILURE TO ADEQUATELY TRAIN, INSTRUCT, CORRECT, DISCIPLINE,  
SUPERVISE, AND TRAIN POLICE OFFICERS**

45. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1-44 of this Complaint as if fully rewritten herein.

46. This Count IV is brought by Plaintiff against Defendants Mississippi Department of Public Safety and Forrest County Sheriff's Department failure to adequately instruct, correct, discipline, train, supervise and correct individual Defendants herein.

47. As a direct and proximate result of the foregoing illegal and willful and wanton acts and omissions of the Defendants, Plaintiff suffered physical injury, emotional trauma, medical expenses, and severe mental anguish.

**WHEREFORE**, Plaintiff Derrick Steverson demands judgment against the Defendants, jointly and severally, for compensatory damages in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus attorney's fees and the costs of this action, together with such other and further relief as the Court deems just and equitable.

**COUNT V - STATE CLAIMS -  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

48. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1-47 of this Complaint as if fully rewritten herein.

49. This Count V is brought by Plaintiff against all Defendants for intentional infliction of emotional distress.

50. As a direct and proximate result of the foregoing illegal and willful and wanton acts and omissions of Defendants, Plaintiff suffered physical injury, emotional trauma, medical expenses, and severe mental anguish.

**WHEREFORE**, Plaintiff Derrick Steverson demands judgment against Defendants, jointly and severally, for compensatory damages in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus attorney's fees and the costs of this action, together with such other and further relief as the Court deems just and equitable.

**COUNT VI - STATE CLAIMS -  
SPOILIATION OF EVIDENCE**

51. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1-50 of this Complaint as if fully rewritten herein.

52. This Count VI is brought by Plaintiff against all Defendants for intentional destruction of evidence in this case, specifically audio/video of the incident that took place at the Forrest County Jail on March 27, 2011.

53. As a direct and proximate result of the foregoing illegal and willful and wanton acts and omissions of Defendants, Plaintiff suffered physical injury, emotional trauma, medical expenses, and severe mental anguish.

**WHEREFORE**, Plaintiff Derrick Steverson demands judgment against Defendants, jointly and severally, for compensatory damages in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00), plus attorney's fees and the costs of this action, together with such other and further relief as the Court deems just and equitable.

Respectfully submitted, this the 13<sup>th</sup> day of July, 2012.

DERRICK STEVERSON

By: 

PETER H. BARRETT (MSB #2069)

WILLIAM C. BARRETT (MSB #103326)

**P. & W. BARRETT LAWYERS, PLLC**

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Email: [wbarrett@pandwbarrettlawyers.com](mailto:wbarrett@pandwbarrettlawyers.com) (William C. Barrett)



**CERTIFICATE OF SERVICE**

I, William C. Barrett, do hereby certify that I have this date served, via hand delivery, Facsimile and/or United States mail, postage prepaid, a true and correct copy of the foregoing *Complaint* upon the following:

James K. Dukes Jr.  
Dukes, Dukes & Wood  
226 West Pine Street  
Hattiesburg, MS 39401

Charles Bolton  
Forrest County Jail Chief Administrative Officer  
316 Forrest St # 2,  
Hattiesburg, MS 39401-3453

Santa Cruz  
Commissioner of Public Safety  
1900 East Woodrow Wilson Drive  
Jackson, MS 39216

Sheriff Billy Bob McGee  
P.O. Box 747  
Hattiesburg, MS 39403

David Miller  
Board Attorney  
Board of Supervisors of Forest County, MS  
P.O. Box 1310  
Hattiesburg, MS 39403-1310

Trooper Jamie Atkins  
Wherever found

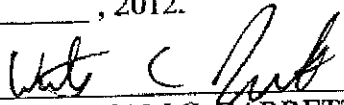
Trooper Clay Loftin  
Wherever found

Deputy Matt Findley  
Wherever found

Captain Glen Moore  
Wherever found

Deputy Randall Smith  
Wherever found

This the 13<sup>th</sup> day of July, 2012.

  
\_\_\_\_\_  
WILLIAM C. BARRETT

<b>COVER SHEET</b> <b>Civil Case Filing Form</b> <i>(To be completed by Attorney/Party Prior to Filing of Pleading)</i>		<b>Court Identification</b> <b>Docket Number</b> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div> <div style="display: flex; justify-content: space-around; font-size: 8px; margin-top: 5px;"> <span>County #</span> <span>Judicial District</span> <span>Court ID (CH, CI, CO)</span> </div> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div> <div style="display: flex; justify-content: space-around; font-size: 8px; margin-top: 5px;"> <span>Month</span> <span>Date</span> <span>Year</span> </div>	<b>Case Year</b> <div style="border: 1px solid black; width: 60px; height: 20px; margin: 5px auto;"></div>	<b>Docket Number</b> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div> <div style="display: flex; justify-content: space-around; font-size: 8px; margin-top: 5px;"> <span>Local Docket ID</span> </div>
Mississippi Supreme Court Administrative Office of Courts		Form AOC-01 (Retired 1/1/2001)		Case Number if filed prior to 1/1/94
This area to be completed by clerk				
IN THE <u>CIRCUIT</u> COURT OF <u>FORREST</u> COUNTY				
Short Style of Case: <u>Derrick Stevenson vs Forrest County Mississippi, et al.</u> MS Bar No. <u>103326</u>				
Party Filing Initial Pleading: Type/Print Name <u>William C. Barrett</u> Signature _____				
Check (✓) if Not an Attorney _____ Check (✓) if Pro Hac Vice _____				
Compensatory Damages Sought: \$ _____ Punitive Damages Sought: \$ _____				
Is Child Support contemplated as an issue in this suit? Yes _____ No <u>✓</u> If "yes" is checked, please submit a completed Child Support Information Sheet with Final Decree/Judgment				
<b>PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM</b>				
Individual <u>Stevenson</u> <u>Derrick</u> (_____) Middle Init. _____ Jr/Sr/III/IV _____ Last Name First Name Maiden Name, if Applicable				
Address of Plaintiff _____				
Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____				
Estate of _____				
Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____				
D/B/A / Agency _____				
Business _____ Enter legal name of business, corporation, partnership, agency - if Corporation, indicate state where incorporated				
Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____				
D/B/A: _____				
<b>DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM</b>				
Individual <u>Forrest County Mississippi</u> (_____) Middle Init. _____ Jr/Sr/III/IV _____ Last Name First Name Maiden Name, if Applicable				
Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____				
Estate of _____				
✓ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____				
D/B/A / Agency <u>Forrest County Mississippi</u>				
Business _____ Enter legal name of business, corporation, partnership, agency - if Corporation, indicate state where incorporated				
Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below: _____				
D/B/A: _____				
ATTORNEY FOR THIS DEFENDANT: _____ Bar No. _____ or Name: _____ Pro Hac Vice (✓) _____ (if known)				
<b>In left hand column, check one (1) box that best describes the nature of this suit. In right hand column check all boxes which indicate secondary claims.</b>				
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <b>Business/Commercial</b>  <input type="checkbox"/> Accounting (Business)  <input type="checkbox"/> Bankruptcy  <input type="checkbox"/> Business Dissolution - Corporation  <input type="checkbox"/> Business Dissolution - Partnership  <input type="checkbox"/> Debt Collection  <input type="checkbox"/> Employment  <input type="checkbox"/> Examination of Debtor  <input type="checkbox"/> Execution  <input type="checkbox"/> Foreign Judgment  <input type="checkbox"/> Garnishment  <input type="checkbox"/> Pension  <input type="checkbox"/> Receivership  <input type="checkbox"/> Replevin  <input type="checkbox"/> Stockholder Suit  <input type="checkbox"/> Other _____ </div> <div style="width: 30%;"> <b>Domestic Relations</b>  <input type="checkbox"/> Child Custody/Visitation  <input type="checkbox"/> Child Support  <input type="checkbox"/> Contempt  <input type="checkbox"/> Divorce: Fault  <input type="checkbox"/> Divorce: Irreconcilable Differences  <input type="checkbox"/> Domestic Abuse  <input type="checkbox"/> Emancipation  <input type="checkbox"/> Modification  <input type="checkbox"/> Paternity  <input type="checkbox"/> Property Division  <input type="checkbox"/> Separate Maintenance  <input type="checkbox"/> Termination of Parental Rights  <input type="checkbox"/> UIFSA (formerly URESA)  <input type="checkbox"/> Other _____ </div> <div style="width: 30%;"> <b>Contract</b>  <input type="checkbox"/> Breach of Contract  <input type="checkbox"/> Installment Contract  <input type="checkbox"/> Insurance  <input type="checkbox"/> Product Liability under Contract  <input type="checkbox"/> Specific Performance  <input type="checkbox"/> Other _____ </div> </div>				
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <b>Probate</b>  <input type="checkbox"/> Accounting (Probate)  <input type="checkbox"/> Birth Certificate Correction  <input type="checkbox"/> Commitment  <input type="checkbox"/> Conservatorship  <input type="checkbox"/> Guardianship  <input type="checkbox"/> Heirship  <input type="checkbox"/> Intestate Estate  <input type="checkbox"/> Minor's Settlement  <input type="checkbox"/> Muniment of Title  <input type="checkbox"/> Name Change  <input type="checkbox"/> Power of Attorney  <input type="checkbox"/> Testate Estate  <input type="checkbox"/> Will Contest  <input type="checkbox"/> Other _____ </div> <div style="width: 30%;"> <b>Statutes/Rules</b>  <input type="checkbox"/> Bond Validation  <input type="checkbox"/> Civil Forfeiture  <input type="checkbox"/> Declaratory Judgment  <input type="checkbox"/> ERISA  <input type="checkbox"/> Eminent Domain  <input type="checkbox"/> Extraordinary Writ  <input type="checkbox"/> Federal Statutes  <input type="checkbox"/> Injunction or Restraining Order  <input type="checkbox"/> Municipal Annexation  <input type="checkbox"/> Racketeering (RICO)  <input type="checkbox"/> Railroad  <input type="checkbox"/> Seaman  <input type="checkbox"/> Other _____ </div> <div style="width: 30%;"> <b>Appeals</b>  <input type="checkbox"/> Administrative Agency  <input type="checkbox"/> County Court  <input type="checkbox"/> Hardship Petition (Driver License)  <input type="checkbox"/> Justice Court  <input type="checkbox"/> MS Employment Security Comm'n  <input type="checkbox"/> Municipal Court  <input type="checkbox"/> Oil &amp; Gas Board  <input type="checkbox"/> Workers' Compensation  <input type="checkbox"/> Other _____ </div> </div>				
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <b>Children and Minors - Non-Domestic</b>  <input type="checkbox"/> Adoption - Noncontested  <input type="checkbox"/> Consent to Abortion for Minor  <input type="checkbox"/> Removal of Minority  <input type="checkbox"/> Other _____ </div> <div style="width: 30%;"> <b>Torts - Personal Injury</b>  <input type="checkbox"/> Bad Faith  <input type="checkbox"/> Fraud  <input type="checkbox"/> Loss of Consortium  <input type="checkbox"/> Malpractice - Legal  <input type="checkbox"/> Malpractice - Medical  <input type="checkbox"/> Negligence - General  <input type="checkbox"/> Negligence - Motor Vehicle  <input type="checkbox"/> Products Liability  <input type="checkbox"/> Wrongful Death  <input type="checkbox"/> Other _____ </div> <div style="width: 30%;"> <b>Mass Tort</b>  <input type="checkbox"/> Asbestos  <input type="checkbox"/> Chemical Spill  <input type="checkbox"/> Dioxin  <input type="checkbox"/> Hand/Arm Vibration  <input type="checkbox"/> Hearing Loss  <input type="checkbox"/> Radioactive Materials  <input type="checkbox"/> Other _____ </div> </div>				
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <b>Real Property</b>  <input type="checkbox"/> Adverse Possession  <input type="checkbox"/> Ejectment  <input type="checkbox"/> Eminent Domain  <input type="checkbox"/> Judicial Foreclosure  <input type="checkbox"/> Lien Assertion  <input type="checkbox"/> Partition  <input type="checkbox"/> Receiver Appointment  <input type="checkbox"/> Tax Sale: Confirmation/Cancellation  <input type="checkbox"/> Title, Boundary &amp;/or Easement  <input type="checkbox"/> Other _____ </div> <div style="width: 30%;"> <b>Civil Rights</b>  <input type="checkbox"/> Elections  <input type="checkbox"/> Habeas Corpus  <input type="checkbox"/> Post Conviction Relief  <input type="checkbox"/> Prisoner  <input checked="" type="checkbox"/> Other <u>42 USC Section 1983</u> </div> </div>				

**IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI**  
**JUDICIAL DISTRICT, CITY OF Hattiesburg**

Docket No. \_\_\_\_\_ Docket No. If Filed  
 File Yr \_\_\_\_\_ Chronological No. \_\_\_\_\_ Clerk's Local ID \_\_\_\_\_ Prior to 1/1/94 \_\_\_\_\_

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of 3 Defendants Pages**  
**IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

**Defendant #2:**

**Individual:** Forrest County Sheriff's Dept. \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

✓ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A Forrest County Sheriff's Department

**Business** \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Defendant #3:**

**Individual:** Sheriff Billy McGee \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

✓ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A Forrest County Sheriff Bill McGee

**Business** \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Defendant #4:**

**Individual:** MS Dept. of Public Safety \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

✓ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A Mississippi Department of Public Safety, Commissioner Albert Santa Cruz

**Business** \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI**  
**JUDICIAL DISTRICT, CITY OF Hattiesburg**

Docket No. \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed  
 Prior to 1/1/94 \_\_\_\_\_

**DEFENDANTS IN REFERENCED CAUSE - Page 2 of 3 Defendants Pages**  
**IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

**Defendant # 5 :**

**Individual:** Atkins Jamie (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

**ATTORNEY FOR THIS DEFENDANT:** \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Defendant # 6 :**

**Individual:** Loftin Clay (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

**ATTORNEY FOR THIS DEFENDANT:** \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Defendant # 7 :**

**Individual:** Findley Matt (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

**ATTORNEY FOR THIS DEFENDANT:** \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF Hattiesburg

Docket No. \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed  
 Prior to 1/1/94 \_\_\_\_\_

**DEFENDANTS IN REFERENCED CAUSE - Page 3 of 3 Defendants Pages**  
**IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant # 8 :

Individual: Moore Glen (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Defendant # 9 :

Individual: Smith Randall (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Defendant # \_\_\_\_ :

Individual: \_\_\_\_\_ (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:  
 Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:  
 D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:  
 D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_



217  
7-13-12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CI12-0147

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Deputy Randall Smith, Forrest County Sheriff's Department

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: 

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
By: Lou Ann Adams, Circuit Clerk

This the 24 day of Sept, 2012.

By: 

KIM  
7-13-12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CT12-0147

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Captain Glen Moore, Forrest County Sheriff's Department

NOTICE TO DEFENDANT

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Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: [Signature]

D.C.

CERTIFIED A TRUE CO  
Forrest County, Missis  
Lou Ellen Adams, Circuit

This the 29 day of Sep 2012.  
By: [Signature]



214  
7-13-12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CI12-0147

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Deputy Matt Findley, Forrest County Sheriff's Department

NOTICE TO DEFENDANT

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Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: [Signature]

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ann Adams, Circuit Clerk

This the 24 day of Sept, 2012  
By: [Signature] D.C.

RMJ  
7-13-12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CT12-0147

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Trooper Clay Loftin, Mississippi Highway Patrol

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

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Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: [Signature]

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ann Adams, Circuit Clerk  
D.C.

This the 29 day of Sept, 2012

By: [Signature] D.C.

7-13-12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CI 12-0147

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Trooper Jamie Atkins, Mississippi Highway Patrol

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

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Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: [Signature]

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ann Adams, Circuit Clerk

This the 24 day of Sept, 2012  
By: [Signature] D.C.

7-13-12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CT12-0147

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Mississippi Department of Public Safety, Commissioner Albert Santa Cruz

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

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Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: [Signature]

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

This the 29 day of sep, 2012

By: [Signature] D.C.

213  
7-13-12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CF12-0147

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Forrest County Sheriff Billy McGee

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: [Signature]

CERTIFIED A TRUE COPY  
D.C.  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

This the 29 day of Sep, 2012

By: [Signature] D.C.

CHS  
7.13.12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CI 12-0147

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Forrest County Sheriff's Department

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: [Signature]

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

This the 24 day of Sept, 2012  
By: [Signature] D.C.



7.13.12

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

DERRICK STEVERSON

PLAINTIFF

VS

CAUSE # CI12-0147

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Forrest County Mississippi, Board of Supervisors

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: [Signature] CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ann Adams, Circuit Clerk  
This the 24 day of SEP 2012  
By: [Signature]

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI  
FILED

DERRICK STEVERSON

SEP 05 2012

PLAINTIFF

VS

*Lou Ann Adams*  
FORREST COUNTY CIRCUIT CLERK

CAUSE # CF12-0147

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Deputy Randall Smith, Forrest County Sheriff's Department

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

BY: *[Signature]*

CERTIFIED A TRUE COPY  
Forrest County, Missis  
Lou Ellen Adams, Circuit

This the 29 day of Sept 2012

By: *[Signature]*



## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: Dept. Randall Smith

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

V **PERSONAL SERVICE.** I 31 personally delivered copies to Ponnell Brannon on the 31 day of August, where I found said person(s) in Forest County of the State of Mississippi.

**RESIDENCE SERVICE.** After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

**CERTIFIED MAIL.** By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_, or that delivery was refused.

**PUBLICATION.** By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert Abbott Social Security No.: 427-45-6131

Address: 220 Franklin Rd Braxton, MS 39044 Telephone No.: 601-540-3711

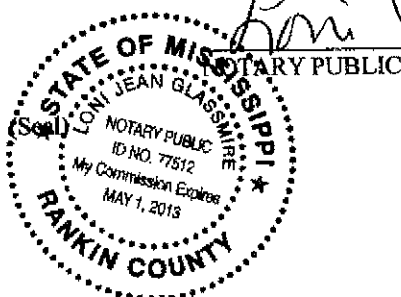
STATE OF MISSISSIPPI

COUNTY OF Rankin

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

[Signature]  
PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of Sept, 12.



My Commission Expires: May 01, 2013

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI  
FILED

DERRICK STEVERSON

PLAINTIFF

SEP 05 2012

VS

*Lou Ann Adams*  
FORREST COUNTY CIRCUIT CLERK

CAUSE # CF12-0147

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Captain Glen Moore, Forrest County Sheriff's Department

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal) CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

BY: *[Signature]*

This the 24 day of Sept, 2012  
By: *[Signature]* D.C.

## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: Glen Moore (captain)

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

X **PERSONAL SERVICE.** I 1 personally delivered 1 copies to Wendy Carmichael on the 31 day of August, where I found said person(s) in Forrest County of the State of Mississippi.

**RESIDENCE SERVICE.** After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

**CERTIFIED MAIL.** By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, or that delivery was refused.

**PUBLICATION.** By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert Abbott  
Address: 220 Franklin Rd. Braxton, MS 39044

Social Security No.: 427-45-6431

Telephone No.: 601-540-3711

STATE OF MISSISSIPPI

COUNTY OF Rankin

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

Robert Abbott  
PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of Sept, 2012.



My Commission Expires: May 01, 2013

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

FILED

PLAINTIFF

DERRICK STEVERSON

SEP 05 2012

CAUSE # CZ12-0147

VS

*Lou Ann Adams*  
FORREST COUNTY CIRCUIT CLERK

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Deputy Matt Findley, Forrest County Sheriff's Department

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

BY *[Signature]*

This the 24 day of Sep, 2012

By *[Signature]*

## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: Dept. Matt Findley

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

X **PERSONAL SERVICE.** I, Wendy Carmichael on the 31 day of August, 2012, personally delivered 1 copy to Wendy Carmichael, where I found said person(s) in Forrest County of the State of Mississippi.

**RESIDENCE SERVICE.** After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

**CERTIFIED MAIL.** By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, or that delivery was refused.

X **PUBLICATION.** By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert Abbott  
 Address: 220 Franklin Rd Braxton, MS 39044

Social Security No.: 427-45-6131Telephone No.: 601-540-3111

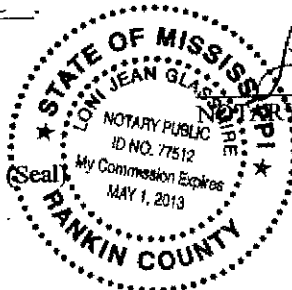
STATE OF MISSISSIPPI

COUNTY OF Rankin

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

[Signature]  
 PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of Sept, 2012.

My Commission Expires: May 01, 2013



IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

FILED

DERRICK STEVERSON

PLAINTIFF

SEP 05 2012

CAUSE # CF12-0147

VS

*Lou Ann Adams*  
FORREST COUNTY CIRCUIT CLERK

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Trooper Clay Loftin, Mississippi Highway Patrol

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)

CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

BY: *[Signature]*

This the 24 day of Sept, 2012

By: *[Signature]* D.C.

## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: Clay Loftin

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

X **PERSONAL SERVICE.** I 31 personally delivered 1 copies to Timothy D. Smith on the 31 day of August, where I found said person(s) in HINDS County of the State of Mississippi.

**RESIDENCE SERVICE.** After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

**CERTIFIED MAIL.** By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, or that delivery was refused.

**PUBLICATION.** By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert Abbott  
 Address: 220 Franklin Rd. Braxton, MS  
39044  
 STATE OF MISSISSIPPI

Social Security No.: 427456131  
 Telephone No.: 601-540-3111

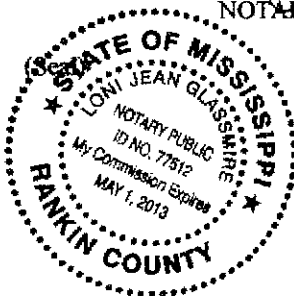
COUNTY OF Rankin

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

[Signature]  
 PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of Sept, 12.

[Signature]  
 NOTARY PUBLIC

My Commission Expires May 01, 2013

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

FILED

DERRICK STEVERSON

PLAINTIFF

SEP 05 2012

CAUSE # CF12-0147

VS

*Lou Ann Adams*  
FORREST COUNTY CIRCUIT CLERK

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Trooper Jamie Atkins, Mississippi Highway Patrol

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal) CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

BY: *[Signature]*

This the 24 day of Sep, 2012

By: *[Signature]* D.C.



## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: Jamie Atkins

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

X **PERSONAL SERVICE.** I 31 personally delivered copies to Timothy D. Smith on the 31 day of August, where I found said person(s) in HINDS County of the State of Mississippi.

**RESIDENCE SERVICE.** After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

**CERTIFIED MAIL.** By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_, or that delivery was refused.

**PUBLICATION.** By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert Abbott  
Address: 220 Franklin Rd Braxton, MS 39044

Social Security No.: 42745-6131

Telephone No.: 601-640-3711

STATE OF MISSISSIPPI

COUNTY OF Rankin

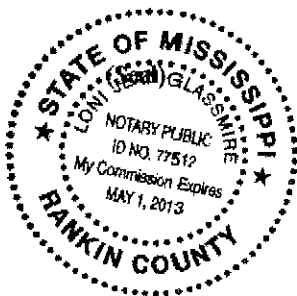
PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

Robert Abbott  
PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of Sept, 12.

Prin Oja Nassari  
NOTARY PUBLIC

My Commission Expires: May 01, 2013



IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI  
FILED

DERRICK STEVERSON

SEP 05 2012

PLAINTIFF

VS

*Lou Ann Adams*  
FORREST COUNTY CIRCUIT CLERK

CAUSE # CH12-0147

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Mississippi Department of Public Safety, Commissioner Albert Santa Cruz

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal)  
CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

This the 24 day of Sept, 2012

By: *[Signature]* D.C.

BY: *[Signature]*

## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: Commissioner Albert Santa Cruz

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

☒ **PERSONAL SERVICE.** I 1 personally delivered 1 copies to Timothy D. Smith on the 31 day of August, where I found said person(s) in Hinds County of the State of Mississippi.

**RESIDENCE SERVICE.** After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

**CERTIFIED MAIL.** By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_, or that delivery was refused.

**PUBLICATION.** By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert Abbott

Social Security No.: 427 45 6131

Address: 220 Franklin Rd Benton, MS 39044

Telephone No.: 601 540 3711

STATE OF MISSISSIPPI

COUNTY OF Rankin

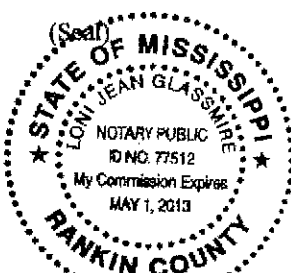
PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

[Signature]  
PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of Sept, 12.

[Signature]  
NOTARY PUBLIC

My Commission Expires: May 01, 2013



IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

FILED

PLAINTIFF

DERRICK STEVERSON

SEP 15 2012

CAUSE # CT 12-0147

VS

*Lou Ann Adams*  
FORREST COUNTY CIRCUIT CLERK

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Forrest County Mississippi, Board of Supervisors

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal) CERTIFIED A TRUE COPY

Forrest County, Mississippi  
Lou Ann Adams, Circuit Clerk

This the 24 day of Sep, 2012

By: [Signature] D.C.

## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: David Miller

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

X **PERSONAL SERVICE.** I 31 personally delivered 1 copies to David Miller on the 31 day of August, where I found said person(s) in Forrest County of the State of Mississippi.

**RESIDENCE SERVICE.** After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

**CERTIFIED MAIL.** By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_, or that delivery was refused.

**PUBLICATION.** By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert AbbottSocial Security No.: 427-45-6131Address: 220 Franklin Rd Briston, MS 39044Telephone No.: (601)-540-3711

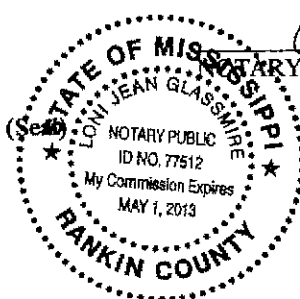
STATE OF MISSISSIPPI

COUNTY OF Rankin

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

[Signature]  
PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of SEP, 2012.

My Commission Expires: May 01, 2013



IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

FILED

DERRICK STEVERSON

PLAINTIFF

SEP 05 2012

CAUSE # CT12-0147

VS

*Lou Ann Adams*  
FORREST COUNTY CIRCUIT CLERK

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Forrest County Sheriff's Department

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal) TIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ellen Adams, Circuit Clerk

BY: *[Signature]*

This the 24 day of SEP, 2012

By: *[Signature]* D.C.

## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: Charles Bolton

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

☒ **PERSONAL SERVICE.** I Donnell Brannon personally delivered 1 copies to Donnell Brannon on the 31 day of August, where I found said person(s) in Forrest County of the State of Mississippi.

**RESIDENCE SERVICE.** After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

**CERTIFIED MAIL.** By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, or that delivery was refused.

**PUBLICATION.** By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert Abbott  
 Address: 220 Franklin Rd Braxton, MS  
39044  
 STATE OF MISSISSIPPI  
 COUNTY OF Rankin

Social Security No.: 487-45-6131  
 Telephone No.: 601-540-3711

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

[Signature]  
 PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of Sept, 2012.



[Signature]  
 NOTARY PUBLIC

My Commission Expires: May 01, 2013



IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

FILED

DERRICK STEVERSON

PLAINTIFF

SEP 05 2012

CAUSE # CF12-0147

VS

*[Signature]*  
FORREST COUNTY CIRCUIT CLERK

DEFENDANTS

FORREST COUNTY MISSISSIPPI;  
FORREST COUNTY SHERIFF'S DEPARTMENT;  
FORREST COUNTY SHERIFF BILLY MCGEE;  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,  
COMMISSIONER ALBERT SANTA CRUZ;  
TROOPER JAMIE ATKINS AND TROOPER CLAY LOFTIN,  
INDIVIDUALLY, AND IN THEIR PROFESSIONAL CAPACITY AS  
OFFICERS OF THE MISSISSIPPI HIGHWAY PATROL;  
DEPUTY MATT FINDLEY, CAPTAIN GLEN MOORE,  
AND DEPUTY RANDALL SMITH, INDIVIDUALLY, AND  
IN THEIR PROFESSIONAL CAPACITY AS OFFICERS OF  
THE FORREST COUNTY SHERIFF'S DEPARTMENT;  
JOHN AND/OR JANE DOES 1-10

SUMMONS

THE STATE OF MISSISSIPPI

TO: Forrest County Sheriff Billy McGee

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to P. & W. Barrett, Lawyers, PLLC; 107 North State Street, Jackson, MS 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 13 day of July, 2012.

Lou Ann Adams, Clerk  
Circuit Court of Forrest County, Mississippi

(seal) CERTIFIED A TRUE COPY  
Forrest County, Mississippi  
Lou Ann Adams, Circuit Clerk

This the 24 day of Sep, 2012  
By: *[Signature]* R.T.

BY: *[Signature]*

## PROOF OF SERVICE- SUMMONS

Name of Person or Entity Served: Sheriff Billy Bob Magee

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below:

PERSONAL SERVICE. I personally delivered 1 copies to Wendy Carmichael on the 31 day of August, where I found said person(s) in Forrest County of the State of Mississippi.

RESIDENCE SERVICE. After exercising reasonable diligence, I was unable to deliver copies to said person within \_\_\_\_\_ County, \_\_\_\_\_. I served the Summons and Complaint on the \_\_\_\_\_ day of \_\_\_\_\_, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with \_\_\_\_\_, who is the (relationship), a member of the family of the person served above the age of sixteen (16) years and willing to receive the Summons and Complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

CERTIFIED MAIL. By certified mail, return receipt requested, in an envelope marked "Restricted Delivery," and as set out by Rule 4 of the Mississippi Rules of Civil Procedure, I served a copy of the Summons and Complaint on \_\_\_\_\_, at the address contained on the Summons. The return receipt shows that the Summons and Complaint were signed for by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, or that delivery was refused.

PUBLICATION. By publication, made once in each week during three successive weeks in a public newspaper of the county in which the complaint is pending, such service by publication being proper as provided by statute and/or the Mississippi Rules of Civil Procedure.

At the time of service, I was at least eighteen (18) years of age.

Process server: Robert Abbott

Social Security No.: 422 45 613 1

Address: 220 Franklin Rd Braxton, MS 39044

Telephone No.: 601 540 3711

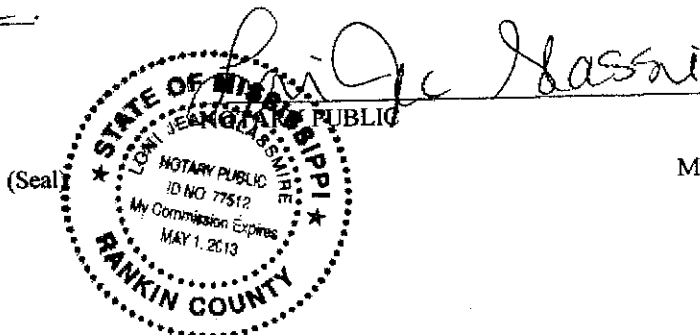
STATE OF MISSISSIPPI

COUNTY OF Rankin

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the state and county aforesaid, the within named Robert Abbott, who being first by me duly sworn, states on oath that the matters and facts set forth in the foregoing "Proof of Service- Summons" are true and correct as therein stated.

Robert Abbott  
PROCESS SERVER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 4 day of Sept, 2012.



My Commission Expires: May 01, 2013



Peter H. Barrett

William C. Barrett

pbarrett@pandwbarrettlawyers.com

wbarrett@pandwbarrettlawyers.com

September 4, 2012

FILED

SEP 05 2012

  
 FORREST COUNTY CIRCUIT CLERK

Lou Ellen Adams, Clerk  
 Forrest County Circuit Court  
 Post Office Box 992  
 Hattiesburg, Mississippi 39403

Re: *Derrick Steverson v. Forrest County, MS et al.* [CI12-0147]  
 Proof of Service of Complaint

Dear Ms. Adams:

Enclosed for filing in the above referenced civil matter, please find the originals and one copy of the following:

1. *Proof of Service and Summons for each Defendant*

Please return a "Filed" stamped copy of each document to my office, using the postage-prepaid envelope which is enclosed. I appreciate your assistance in this matter, and with best regards, I remain

Sincerely,



WILLIAM C. BARRETT

## CAPITAL OFFICE

107 North State Street • Jackson, MS 39201  
 601.973.2270

## GULF COAST OFFICE

2202C 25th Avenue, C-3 • Gulfport, MS 39501  
 228.864.9885